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10 **UNITED STATES BANKRUPTCY COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION**

13 **In re:**

14 **PG&E CORPORATION,**

15 **- and -**

16 **PACIFIC GAS AND ELECTRIC COMPANY,**

17 **Debtors.**

18 Affects PG&E Corporation
19 Affects Pacific Gas and Electric Company
 Affects both Debtors

20 * *All papers shall be filed in the Lead Case,
21 No. 19-30088 (DM).*

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Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**STIPULATION ENLARGING TIME
FOR ANNE MARIE POUNDS TO
FILE PROOF OF CLAIM**

[Related to Dkt. Nos. 7623-24]

[No Hearing Requested]

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the
2 “**Utility**”), as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-
3 captioned cases (the “**Chapter 11 Cases**”), on the one hand, and Anne Marie Pounds
4 (“**Movant**”), on the other hand, by and through their respective counsel, hereby submit this
5 stipulation (the “**Stipulation**”) for an order enlarging the time for Movant to file a claim in the
6 Chapter 11 Cases as set forth herein. The Debtors and Movant are referred to in this Stipulation
7 collectively as the “**Parties**,” and each as a “**Party**.**”** The Parties hereby stipulate and agree as
8 follows:

9 **RECITALS**

10 A. On January 29, 2019 (the “**Petition Date**”), the Debtors commenced these Chapter 11
11 Cases in the United States Bankruptcy Court for the Northern District of California (the
12 “**Bankruptcy Court**”).

13 B. By Order dated July 1, 2019 [Docket No. 2806] (the “**Bar Date Order**”), the
14 Bankruptcy Court set October 21, 2019 at 5:00 p.m. (Prevailing Pacific Time) (the “**Original Bar**
15 **Date**”) as the deadline in these Chapter 11 Cases for filing proofs of claim in respect of any of
16 prepetition claim (as defined in section 101(5) of the Bankruptcy Code) against either of the Debtors,
17 including all claims of Fire Claimants,¹ Wildfire Subrogation Claimants, Governmental Units (as
18 defined in section 101(27) of the Bankruptcy Code), and Customers, and for the avoidance of doubt,
19 including all secured claims and priority claims.

20 C. By Order dated November 11, 2019, the Bankruptcy Court extended the Bar Date
21 until December 31, 2019 at 5:00 p.m. (Prevailing Pacific Time), solely for the benefit of any non-
22 governmental Fire Claimants who had not filed proofs of claim by the Original Bar Date.

23 D. On May 27, 2020, Movant filed the *Motion Pursuant to Fed. R. Bankr. 9006(b)(1) to*
24 *Deem Anne Marie Pounds’ Claim Timely Filed* [Dkt. No. 7623] (the “**Motion**”), in which Movant
25 asserts she should be permitted to file a late claim for damages allegedly sustained as a result of the

26
27 ¹ Capitalized terms used but not otherwise herein defined have the meanings ascribed to such terms
in the Bar Date Order.
28

1 Camp Fire (the “**Asserted Claim**”). The Motion is set for hearing on June 24, 2020 (the
2 “**Hearing**”). *See* Dkt. No. 7624.

3 E. On May 22, 2020, Movant filed Proof of Claim No. 105326 on account of the
4 Asserted Claim that is the subject of the Motion (the “**Proof of Claim**”).

5 F. The Debtors have raised with Movant certain informal objections to the relief
6 requested in the Motion.

7 G. The Official Committee of Tort Claimants has reviewed the Stipulation and, based on
8 the facts presented in the Motion, has no objection to the agreements set forth herein or to entry of an
9 Order approving the terms of the Stipulation.

10 H. The Parties hereto desire to resolve their issues regarding the Motion.

11 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
12 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
13 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT
TO ORDER, THAT:

14 1. The Proof of Claim shall be deemed timely filed.

15 2. Nothing herein is intended to, nor shall it be construed to be, a waiver by the Debtors
16 or any other party in interest of any right to (i) object to the Asserted Claim or the Proof of Claim on
17 any grounds other than the untimely filing thereof, or (ii) seek to reclassify the Proof of Claim.

18 3. Nothing herein is intended to, nor shall it be construed to be, a waiver by Movant of
19 her right to seek to reclassify the Proof of Claim or to assert any other right in contravention to or in
20 opposition of any asserted challenge to the Proof of Claim.

21 4. Upon entry of an Order approving the Stipulation, the Motion shall be deemed
22 withdrawn and the Hearing vacated.

23 5. In the event that the terms of this Stipulation are not approved by the Bankruptcy
24 Court, it shall be null and void and have no force or effect and the Parties agree that, in such
25 circumstances, this Stipulation shall be of no evidentiary value whatsoever in any proceedings.

26 6. This Stipulation shall be binding on the Parties and each of their successors in
27 interest.

7. This Stipulation shall constitute the entire agreement and understanding of the Parties relating to the subject matter hereof and supersede all prior agreements and understandings relating to the subject matter hereof.

8. This Stipulation may be executed in counterparts, each of which shall be deemed an original but all of which together shall constitute one and the same agreement.

9. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or controversies arising from this Stipulation or any Order approving the terms of this Stipulation.

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1 Dated: June 3, 2020
2 WEIL GOTSHAL & MANGES LLP
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4 /s/ Matthew Goren
5 Matthew Goren, Esq.
6 *Attorneys for Debtors
and Debtors in Possession*
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Dated: June 3, 2020
EDELSON PC

/s/ Rafey Balabanian
Rafey Balabanian, Esq.
Attorneys for Anne Marie Pounds